

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

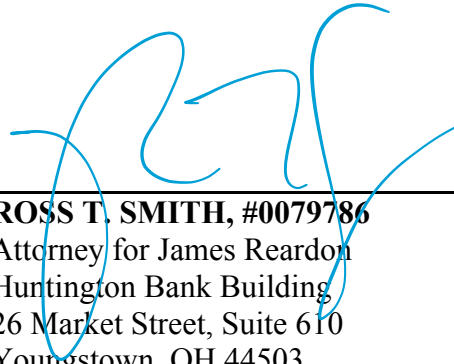
<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Criminal No.: 4:19-CR-576</b>
	)	
<b>v.</b>	)	<b>JUDGE PATRICIA A. GAUGHAN</b>
	)	
<b>JAMES REARDON,</b>	)	
	)	
<b>Defendant.</b>	)	<b><u>UNOPPOSED MOTION TO ATTEND</u></b>
	)	<b><u>FAMILY MEMBERS MEMORIAL</u></b>
	)	<b><u>SERVICE</u></b>

COMES NOW the Defendant, James Reardon, by and through undersigned Counsel, and respectfully moves this Honorable Court for an Order to attend the Memorial Service regarding his Grandmother, Patricia Rose Reardon, who died recently.

For cause, Counsel has been made aware that Mr. Reardon's grandmother has passed away. Counsel has verified that the memorial services will be held Saturday, March 7, 2020, at Johnny's Banquet Center, located at 7334 Market Street, Youngstown, Ohio, 44512. The Memorial Service is scheduled to take place from 4:00 p.m. until 8:00 p.m. The Defendant, James Reardon, is currently incarcerated at the Mahoning County Jail, and respectfully moves this Honorable Court for an Order allowing his release solely for the ability to attend the above services and to properly pay respects to his grandmother, and to return immediately to the Mahoning County Jail. Further, Counsel has spoken with Assistant U.S. Attorney David Toepfer, and the Government has no objection or opposition to the within request.

**WHEREFORE**, for the above-stated reasons, the Defendant, James Reardon, by and through undersigned Counsel, moves this Honorable Court for leave to attend the memorial services at Johnny's Banquet Center, 7334 Market Street, Youngstown, Ohio, 44512, scheduled on Saturday, March 7, 2020, from 4:00 p.m. to 8:00 p.m.

Respectfully submitted,



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**ROSS T. SMITH, #0079786**

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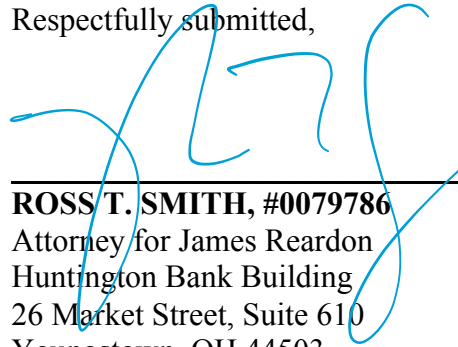
Facsimile: (800) 910-6030

Email: [ross@rosssmithlaw.com](mailto:ross@rosssmithlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2020 a copy of foregoing UNOPPOSED MOTION TO ATTEND FAIMLY MEMBERS MEMORIAL SERVICE was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

Respectfully submitted,



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**ROSS T. SMITH, #0079786**

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